

EXHIBIT F

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JASON SILVERSTEIN, JENNIFER STAMATELOS,
individually and behalf of others similarly
situated,

PLAINTIFF,

CASE NO. 09-CV-5904 (VM)

-against-

ALLIANCEBERNSTEIN, L.P.,

DEFENDANT.

-----X

DATE: April 3, 2012

TIME: 10:00 a.m.

EXAMINATION BEFORE TRIAL of the Opt-In
Plaintiff, JUSTIN GOTTLIEB, taken by the
Defendant, pursuant to a Notice, held at Seyfarth
Shaw, LLP., 620 Eighth Avenue, New York, New York
10018, before SHAVON KOLB, RPR, a Notary Public of
the State of New York.

<p>1 GOTTLIEB</p> <p>2 Q. And that's your own business?</p> <p>3 A. Yes.</p> <p>4 Q. Is it part-time?</p> <p>5 A. Barely even. It's more of a referral</p> <p>6 business.</p> <p>7 Q. Do you have a partner or do you work</p> <p>8 with --</p> <p>9 A. No.</p> <p>10 Q. So you started looking for a new job</p> <p>11 when you were still working at AllianceBernstein,</p> <p>12 right?</p> <p>13 A. Correct.</p> <p>14 Q. Do you recall approximately when you</p> <p>15 started the job search?</p> <p>16 A. I don't recall exactly, no.</p> <p>17 Q. And how did you look for jobs?</p> <p>18 A. The Internet and recruiters.</p> <p>19 Q. Other than I'm assuming you interviewed</p> <p>20 at Barclays?</p> <p>21 A. Right.</p> <p>22 Q. Other than Barclays did you interview</p> <p>23 anywhere else?</p> <p>24 A. I did.</p> <p>25 Q. Where?</p>	<p>1 GOTTLIEB</p> <p>2 Q. Did that person work as an APM?</p> <p>3 A. No.</p> <p>4 Q. And did you interview for the position?</p> <p>5 A. Yes.</p> <p>6 Q. Who did you interview with?</p> <p>7 A. From what I recall it was Tom Apostolico</p> <p>8 and Matt Kaplan and there may have been -- I don't</p> <p>9 remember if I met with the other guy but it was a</p> <p>10 while ago.</p> <p>11 Q. And you interviewed for the APM</p> <p>12 position?</p> <p>13 A. Right.</p> <p>14 Q. You didn't apply to AllianceBernstein or</p> <p>15 its predecessor at any point prior to 2005, did</p> <p>16 you?</p> <p>17 A. No.</p> <p>18 Q. Prior to hearing about the job through</p> <p>19 the family friend, were you familiar with the</p> <p>20 company at all?</p> <p>21 A. I believe I'd heard of them.</p> <p>22 MS. AHRENS: We'll mark another document</p> <p>23 as an exhibit.</p> <p>24 (Whereupon, the aforementioned resume</p> <p>25 was marked as Gottlieb Exhibit 4 for</p>
<p style="text-align: center;">[Page 38]</p> <p>1 GOTTLIEB</p> <p>2 A. I don't recall everywhere. I know I</p> <p>3 interviewed at Bear Sterns. I don't remember all</p> <p>4 the other places.</p> <p>5 Q. Did you get any other offers?</p> <p>6 A. I believe I got an offer or two. I</p> <p>7 don't recall exactly.</p> <p>8 Q. You don't recall where?</p> <p>9 A. No.</p> <p>10 Q. When did you first apply for a job with</p> <p>11 AllianceBernstein or its predecessor?</p> <p>12 A. I don't recall the date.</p> <p>13 Q. You began working for AllianceBernstein</p> <p>14 in 2006, correct?</p> <p>15 A. Right.</p> <p>16 Q. You began working for AllianceBernstein</p> <p>17 in July 2005, right?</p> <p>18 A. Right. So it was some time three months</p> <p>19 prior I would assume, within three months.</p> <p>20 Q. And how did you hear about the position?</p> <p>21 A. Family friend of mine knew someone who</p> <p>22 worked there.</p> <p>23 Q. And who was the person that worked at</p> <p>24 AllianceBernstein, if you know?</p> <p>25 A. I don't even remember his name.</p>	<p style="text-align: center;">[Page 40]</p> <p>1 GOTTLIEB</p> <p>2 identification as of this date by the</p> <p>3 Reporter.)</p> <p>4 MS. AHRENS: We just marked Exhibit 4.</p> <p>5 Q. Can you tell me what this document is.</p> <p>6 A. Looks like the resume I had at the time</p> <p>7 I was applying to AllianceBernstein.</p> <p>8 Q. And so it's the resume that you</p> <p>9 submitted in connection with that application?</p> <p>10 A. It's possible.</p> <p>11 Q. Do you have any reason to believe it's</p> <p>12 not the application that you submitted to</p> <p>13 AllianceBernstein?</p> <p>14 A. No. I'm not positive. I've changed it</p> <p>15 many times.</p> <p>16 Q. I can represent that we did take it out</p> <p>17 of your personnel file.</p> <p>18 A. Okay.</p> <p>19 Q. Did you prepare the document?</p> <p>20 A. Yes.</p> <p>21 Q. And can you look over it and let me know</p> <p>22 if it was accurate as of the time of your</p> <p>23 application to AllianceBernstein.</p> <p>24 A. To my knowledge it's accurate.</p> <p>25 Q. And then sitting here today is there</p>

[11] (Pages 38 to 41)

<p>1 GOTTLIEB</p> <p>2 Q. I believe you also said she would</p> <p>3 interact with you to talk about whether you were</p> <p>4 going to meet your deadlines; is that right?</p> <p>5 A. Not if you're going to meet them. If</p> <p>6 you were kind of pressing towards the deadline,</p> <p>7 she would stand behind you and basically do your</p> <p>8 job for you.</p> <p>9 Q. She would actually do your inbox work</p> <p>10 for you?</p> <p>11 A. Not necessarily the inbox work but if</p> <p>12 you were working on an account, she would tell you</p> <p>13 what to do like to get it done quicker.</p> <p>14 Q. And so how frequently did that occur?</p> <p>15 A. We were busy, I mean, it would probably</p> <p>16 happen for almost every deadline. Maybe not</p> <p>17 necessarily with me but with other people as well.</p> <p>18 Q. And then in terms of for you it happened</p> <p>19 when you were busy?</p> <p>20 A. Right.</p> <p>21 Q. And how often were you busy?</p> <p>22 A. What do you mean by that question you</p> <p>23 said?</p> <p>24 Q. Well, I'm just trying to get a sense of</p> <p>25 how often she would stand behind you and kind of</p>	<p>1 GOTTLIEB</p> <p>2 Q. And then you mentioned that you also</p> <p>3 interacted with her when there was anything out of</p> <p>4 the ordinary. What do you mean by that?</p> <p>5 A. If anything I saw that I hadn't</p> <p>6 experienced before and I wasn't sure what to do</p> <p>7 with it, I would go to her.</p> <p>8 Q. Did that happen more frequently in the</p> <p>9 beginning of your employment?</p> <p>10 MS. TURNER: Objection.</p> <p>11 You can answer.</p> <p>12 A. I don't recall when it would happen. I</p> <p>13 think it was sporadic.</p> <p>14 Q. What I'm trying to get at is in the</p> <p>15 beginning of your employment did you find things</p> <p>16 were more out of the ordinary because you hadn't</p> <p>17 already had the experience of performing those job</p> <p>18 duties.</p> <p>19 MS. TURNER: Objection.</p> <p>20 You can answer.</p> <p>21 A. Yes. That sounds reasonable.</p> <p>22 Q. And so about how frequently would you</p> <p>23 interact with Tuppy because you found something</p> <p>24 that was out of the ordinary that you wanted to</p> <p>25 talk to her?</p>
<p>[Page 62]</p> <p>1 GOTTLIEB</p> <p>2 tell you what to do in terms of your account work.</p> <p>3 A. Could be a couple of times a week,</p> <p>4 certain times of the year. It really fluctuated.</p> <p>5 Q. Do you know whether she did the same</p> <p>6 thing for the other APMs?</p> <p>7 A. Yes.</p> <p>8 Q. Do you also have a sense that that</p> <p>9 occurred about a couple of times a week for those</p> <p>10 APMs as well?</p> <p>11 A. More or less.</p> <p>12 Q. Were there some APMs that she would help</p> <p>13 more than others?</p> <p>14 A. Yes.</p> <p>15 Q. Did you have an understanding as to why</p> <p>16 she helped them more than others?</p> <p>17 A. Either less experience or not really</p> <p>18 good at the job I guess. I don't know.</p> <p>19 Q. So then other than Tuppy kind of telling</p> <p>20 you what to do on the accounts a couple of times a</p> <p>21 week when you were hitting up against a deadline,</p> <p>22 did you have any other interaction with her about</p> <p>23 meeting deadlines?</p> <p>24 A. About meeting deadlines specifically I</p> <p>25 don't recall.</p>	<p>[Page 64]</p> <p>1 GOTTLIEB</p> <p>2 A. I don't recall.</p> <p>3 Q. Do you have any sense whether it was</p> <p>4 once a day, once a week, once a month?</p> <p>5 A. I don't.</p> <p>6 Q. But is it true that it occurred more</p> <p>7 frequently at the end, towards the end of your</p> <p>8 employment than at the beginning of the</p> <p>9 employment?</p> <p>10 A. No.</p> <p>11 (Whereupon, the aforementioned letter</p> <p>12 was marked as Gottlieb Exhibit 9 for</p> <p>13 identification as of this date by the</p> <p>14 Reporter.)</p> <p>15 Q. Exhibit 9 is a letter that appears to be</p> <p>16 from you to Tuppy Stuer. Do you recognize this</p> <p>17 document?</p> <p>18 A. Yes.</p> <p>19 Q. And what is it?</p> <p>20 A. My resignation letter.</p> <p>21 Q. That's your signature?</p> <p>22 A. It is.</p> <p>23 Q. And you prepared it?</p> <p>24 A. Yes.</p> <p>25 Q. You prepared it on or about July 17,</p>

[17] (Pages 62 to 65)

<p>1 GOTTLIEB 2 2006? 3 A. Yes. 4 Q. And Tuppy Stuer is also Tuppy Russo, 5 correct? 6 A. Yes. 7 Q. Was your last day of work around July 8 28, 2006? 9 A. I believe so. 10 Q. When you first started working at 11 AllianceBernstein as an APM, did you participate 12 in any training? 13 A. Yes. 14 Q. What kind of training? 15 A. There was some sort of handbook I 16 remember reading and some training from some 17 people there. I don't remember who it was. 18 Q. Did you participate in any formal 19 training? 20 A. I guess how do you define formal? 21 Q. Let's say if you're in more of a 22 classroom setting where someone's lecturing you. 23 A. Not really. It was more thrown 24 together. 25 Q. And do you recall if you shadowed any</p> <p style="text-align: center;">[Page 66]</p>	<p>1 GOTTLIEB 2 A. Yes. 3 Q. Do you recall how many? 4 A. It was just a handful. Maybe five. 5 Q. Do you know whether those five new APMs 6 were put on different teams? 7 A. No. They weren't on my team. 8 Q. And you don't recall anything else about 9 any other training, right? 10 A. I don't remember specifically, no. 11 Q. Were you ever a team leader? 12 A. No. Not that I recall. 13 Q. Were you ever on a team that had a team 14 leader on it? 15 A. Yes. 16 Q. What's your understanding of what the 17 team leader's functions are? 18 A. They pretty much did the same thing as 19 us. They were just more experienced; so they 20 could do it quicker. 21 Q. So other than the fact that they could 22 do their job duties quicker, did you have any 23 understanding about what their other functions 24 would be? 25 A. They would sometimes just tell people</p> <p style="text-align: center;">[Page 68]</p>
<p>1 GOTTLIEB 2 APMs; in other words, followed them around? 3 A. Yes. 4 Q. Do you recall who you shadowed? 5 A. No, I don't. 6 Q. Do you recall how long you shadowed them 7 for? 8 A. I don't remember. 9 Q. Was the training mandatory? 10 A. I believe so. 11 Q. Do you recall anything else about your 12 training at the beginning of your employment? 13 A. Not really. 14 Q. Did you participate in any training 15 throughout the rest of your employment? 16 A. I don't recall. 17 Q. When you started working at 18 AllianceBernstein, were you put on a team? 19 A. Yes. 20 Q. How many people were on your team in the 21 beginning? 22 A. I think it was a total of four. 23 Q. Were you the most junior? 24 A. Yes. 25 Q. Did you train with other new APMs?</p> <p style="text-align: center;">[Page 67]</p>	<p>1 GOTTLIEB 2 what to do from the inbox but that's about it. 3 Q. And what is the inbox? 4 A. That's where the work from the FAAs 5 would come in. 6 Q. What's an FAA? 7 A. I believe it stands for financial 8 advisor's associate. 9 Q. Were you on the same team throughout 10 your employment? 11 A. Not the entire time. 12 Q. Do you know approximately how many teams 13 you were on? 14 A. There were a lot of changes but I don't 15 think I was on more than three. 16 Q. And did you always have approximately 17 four people on each team? 18 A. Yeah. It was always around four. 19 Q. Was there ever a point where there was 20 someone more junior on your team? 21 A. Yes. 22 Q. Did you assist in training that more 23 junior person at all? 24 A. I don't recall. 25 Q. Did you have any training</p> <p style="text-align: center;">[Page 69]</p>

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EXHIBIT G

Justin Gottlieb
301 East 47th Street New York, NY 10017
908-208-4879 justingottlieb@gmail.com

July 17, 2006

Tuppy Steuer
AllianceBernstein
1 North Lexington Avenue
White Plains, NY
10601

Dear Tuppy,

Please accept this letter as my formal notice of resignation from
AllianceBernstein, effective July 28th, 2006.

It's been a great pleasure working with you and representing the
company. I wish you and AllianceBernstein continued success. Please
feel free to call on me if I can help to ensure a smooth transition.

Thank you very much for the opportunity to work here.

Sincerely,



Justin Gottlieb

Associate Portfolio Manager